

# Privacy policy.

References in this privacy policy to “we”, “us” and “our” means ColInvestor. References to “Portal” means the ColInvestor website at [www.coinvestor.co.uk](http://www.coinvestor.co.uk) (“Website”) and any other online services provided by us and any data managed by, displayed or transmitted from such services. References to “you” and “your” means a user of the Website and the services provided by us.

This privacy policy sets out the principles governing our use of the information we obtain about you from you, and where relevant from managers, financial advisers and custodians and from enquiries we make from other organisations such as credit reference and fraud prevention agencies.

Personal information, or personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may check the details you provide with fraud prevention agencies and share your information with them if we suspect fraud. It is important that you do not provide false, inaccurate information or impersonate another individual (your “Personal Information”).

Please read this privacy policy carefully as by accessing and using the Website you confirm that you have read, understood and agree to be bound this privacy policy. If you do not wish to be bound by this privacy policy you should not continue to use or access the Portal.

If you are using the Portal in your capacity as an adviser to an investor, rather than as an investor in your own right, then you warrant and represent to us that:

- (i) you are clearly and lawfully authorised to use the Portal on behalf of such investor, and to bind the investor to this privacy policy;
- (ii) you are authorised by such investor to provide all Personal Information about him/her which you submit via the Portal; and
- (iii) you shall indemnify us for all loss suffered, or likely to be suffered, by us as a result of any breach of the above warranties and representations.

## 1. Personal Information we collect from you

We respect your right to privacy and will only process Personal Information you provide to us in accordance with the General Data Protection Regulation. We are registered with the Information Commissioners Office under registration number ZAO93432.

1.1 When you register with ColInvestor, and whilst you continue to use the Portal and related services, we will collect information from you which will include the following:

- (a) Profile data: Information you provide to us by completing the registration process and other forms on the Portal which might include (but is not limited to) your name, date of birth, postal address, phone number, email address and certain tax and regulatory information. We only request and collect profile data that is necessary for us to process in order to facilitate investment applications you choose to make via the Portal.

- (b) Profile data: Information you provide to us by completing the registration process and other forms on the Portal which might include (but is not limited to) your name, date of birth, postal address, phone number, email address and certain tax and regulatory information. We only request and collect profile data that is necessary for us to process in order to facilitate investment applications you choose to make via the Portal.
- (c) Transaction data: Details about payments to and from you in relation to your investment activity via the Portal.
- (d) Technical data: Includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Portal.
- (e) Usage data: Includes information about how you use the Portal and related services.
- (f) Marketing and Communications data: Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

1.2 We also collect, use and share aggregated data such as statistical or demographic data for any purpose ("Aggregated Data"). Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Portal feature or the number of service types that are purchased. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

1.3 We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health or genetic or biometric data). Nor do we collect any information about criminal convictions and offences.

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## 2. Use of Personal Information

- 2.1 We (or third-party data processors, custodians, agents and sub-contractors acting on our behalf) may collect, store and use your Personal Information for the following purposes:
- (a) to verify your identity in order to prevent and detect crime and money laundering;
  - (b) to manage your Colinvestor account and update the records we hold about you from time to time;
  - (c) to pass onto relevant Managers, Custodians, Investee Companies, third party identification checking services in connection with your decision to participate in Investment Opportunities through the Portal and third-party providers of online investment application processing services;

- (d) to provide and administer the CoInvestor Portal and related services;
- (e) to identify fraud;
- (f) to carry out anonymised statistical analysis and market research;
- (h) to fulfil our regulatory duties;
- (i) to develop and improve our services and products;
- (j) to notify you about changes to our service; or
- (k) to provide you with information, services that you request from us or which we feel may interest you, when you have consented to be contacted for such purposes.

2.2 We have set out below, in a table format, a description of all the ways we plan to use your Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your Personal Information. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Information where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user	Profile	Performance of a contract with you
To provide Portal services to you including:  Verifying your identity;  Processing verification requests;  Managing investment application processes, including payments, fees and charges  Collecting and recovering money owed to us	(a) Profile  (b) Financial  (c) Transaction	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)  (c) Necessary for the legitimate interests of others (preventing fraud)

<p>To manage our relationship with you which will include:</p> <p>Notifying you about changes to our terms or privacy notice;</p> <p>Contacting you to provide reminders on important usage issues;</p> <p>Asking you to leave a review or take a survey; and</p> <p>Responding to you when you contact us via the Portal</p>	<p>(a) Profile</p> <p>(b) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated, study how Users use our Services and to improve our Services into the future)</p>
<p>To administer and protect our business, Portal and related services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Profile</p> <p>(b) Financial</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with our legal obligations</p>
<p>To deliver relevant Portal and related services and content to you and measure or understand the effectiveness of how we serve your interests</p>	<p>(a) Profile</p> <p>(b) Usage</p> <p>(c) Marketing and Communications</p> <p>(d) Technical</p>	<p>Necessary for our legitimate interests (to study how users use our Portal and related services, to develop them, to grow our business and to inform our marketing strategy)</p>

<p>To use data analytics to improve our Portal and related services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of users for our Portal and related services, to keep our Portal updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about services that may be of interest to you</p>	<p>(a) Profile (b) Technical (c) Usage (d) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our Portal and related services and grow our business)</p>

- 2.3 If you do not want us to use your Personal Information in one or more of the ways mentioned above, or to pass your details on to third parties, but you wish to continue accessing and using the Portal, please let us know by contacting us at [connect@coinvestor.co.uk](mailto:connect@coinvestor.co.uk) with the words "Data Protection" in the subject line. Please note that if we are unable to use certain Personal Information, this may limit your use of the Portal and specifically your ability to engage in investment activity through, or otherwise use, the Portal.
- 2.4 Where you authorise an adviser or other third party to register on, and use, the Portal on your behalf, then you acknowledge and agree that we are entitled to use the Personal Information provided by such adviser or third party as if it was provided directly by you, to the extent this information is required by us to provide the services requested by the adviser or such third party on your behalf.
- 2.5 Where you use the Portal as an adviser or Manager or in any other authorised capacity which does not involve you investing in your own right, we only collect Personal Information from you which is necessary to identify you and the particular Investment Opportunity to which your use of the Portal relates.
- 2.6 If you no longer wish an adviser or other third party to use the Portal on your behalf then please contact us at [connect@coinvestor.co.uk](mailto:connect@coinvestor.co.uk).

### 3. Access to Personal Information

- 3.1 You have the right to ask us to provide you with copies of Personal Information that we hold about you at any time. An administrative fee may be payable in exceptional cases, but we will not charge you until we have told you how much the fee is and what it is for, and you have told us you still want to proceed. You should direct any such request to [connect@coinvestor.co.uk](mailto:connect@coinvestor.co.uk) with the words "Data Protection" in the subject line.
- 3.2 In accordance with applicable legal and regulatory requirements, we will retain the records relevant to your ColInvestor account and any activity you have conducted on the Portal for a minimum period of six years following the termination of your access to the Portal. This period may be extended by force of law, regulatory requirement or by mutual consent between you and us.
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### 4. Cookies

- 4.1 The Portal uses cookies to collect information about you.
- 4.2 Cookies are small files, typically made up of letters and numbers, that are stored on your browser when you access a website. We set and access these cookies on your computer in order to automatically log data regarding each visit you make to the website such as your IP address, browser type, referring/exit pages, and operating system. We may use this information to monitor server errors, server administration or to monitor visitor behaviour. These cookies don't collect information that identifies individual site users. All information these cookies collect is aggregated and therefore anonymous. This information is only used to improve how a website works.
- 4.3 Cookies allow us to store information about your preferences and to provide you with a better service. You can however choose to disable the cookies we use by changing your website browser settings. You may also delete cookies that have already been placed on your browser. Please note that disabling or deleting cookies may prevent you from using the full range of services available on the Portal.
- 4.4 We may use cookies to allow this website to remember choices you make (such as your username, or the region you are in) and provide enhanced and more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you may be able to customise from time to time. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.
- 4.5 Cookies may also be used to improve the user experience and to enable some of the functionality provided by this website. Please note that some cookies may be placed by third party service providers who perform some of these functions (or other services) for us. Cookies may be used on this website for the following third-party services: Google Analytics, LinkedIn Follow button, Twitter Follow button, Google +1 button, other social marketing tools and third-party video service providers. Some of these services may be used to track your behaviour on other websites and we have no control over this.

- 4.6 By continuing to use the Portal without adjusting your browser's cookie settings, you agree that we can place these cookies on your device
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## Safeguarding Personal Information

- 5.1 Whilst we take appropriate technical and organisation measures to safeguard the Personal Information that you provide to us, we accept no liability if communications are intercepted by third parties or incorrectly delivered or not delivered.
- 5.2 If we transfer your information to third parties we will take steps to ensure that such transfer and any on-going processing by such third parties is carried out securely and in accordance with applicable privacy law.
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## 6. Your rights

Under data protection legislation you have a number of rights in respect of information held about you. These rights are as follows, and can be exercised in accordance with the applicable legislation:

- **Access to information:** You have the right to request a copy of the information we hold about you. If you would like a copy of some or all of your Personal Information, please email us at [connect@coinvestor.co.uk](mailto:connect@coinvestor.co.uk)
- **Ensuring accuracy of information:** We want to make sure that your Personal Information is accurate and up-to-date. You may ask us to correct or complete information that is inaccurate or incomplete.
- **Right to erasure:** You may have a right to erasure, which is more commonly known as the 'right to be forgotten'. This means that in certain circumstances you can require us to delete Personal Information held about you.
- **Ability to restrict processing:** You may also have the right to require us to restrict our use of your Personal Information in certain circumstances. This may apply, for example, where you have notified us that the information we hold about you is incorrect and you would like us to stop using such information until we have verified that it is accurate.
- **Right to data portability:** You may have the right to receive personal data we hold about you in a format that enables you to transfer such information to another data controller (e.g. such as another service provider).
- **Review by an independent authority:** You will always have the right to lodge a complaint with a supervisory body. The relevant authority in the UK is the Information Commissioner's Office.

- **Preventing direct marketing:** We do not sell your data. From time to time, we may send emails containing information about new features and other news about CoInvestor. This is considered direct marketing. You have the right to stop us from contacting you for these purposes. We will always inform you if we intend to use your personal data for such purposes, or if we intend to disclose your information to any third party for such purposes. You can usually exercise your right to prevent such marketing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [connect@coinvestor.co.uk](mailto:connect@coinvestor.co.uk).
  - **Objecting to other uses of your information:** Objecting to other uses of your information: You may also have the right to object to our use of your information in other circumstances. In particular, where you have consented to our use of your personal data, you have the right to withdraw such consent at any time. You may do this by contacting us at [connect@coinvestor.co.uk](mailto:connect@coinvestor.co.uk).
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## 7. Third party websites

The Portal may contain links to other websites operated by third parties. If you follow a link to any of these websites, please be aware that this privacy policy will not apply and that we accept no responsibility or liability for the content or operation of third party websites. You should read the privacy policy of each website you visit before you submit any personal data to these websites.



## Definitions.

### **Custodian**

means the legal entity appointed by us or a Manager to provide custodian services (including receiving agent services) in relation to an Investment Opportunity

### **Investment Opportunity**

means an investment opportunity listed on the Portal by a Manager or otherwise available via the Portal.

### **Manager**

means the authorised manager of an Investment Opportunity.

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ColInvestor Limited